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Attorney for Plaintiff,
Shelly Leann Hall

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
(Sacramento Division)

Shelly Leann Hall,
Plaintiff,
v.
Commissioner of S.
Defendant.

Case 2:20-cv-02036-EFB

STIPULATION AND PROPOSED ORDER
FOR MODIFICATION OF SCHEDULING
ORDER

Subject to the approval and any further orders of the Court, the parties, by and through counsel of record, stipulate and agree Plaintiff's time to move for summary judgment under the scheduling order should be further extended by four days to Friday, ~~August~~ July 30, 2021¹, all other deadlines to be determined by reference to the Court's scheduling order and that good cause supports the extension of time.

Good cause supporting the revised deadline includes that despite diligence Plaintiff's counsel has been unable to finalize Plaintiff's motion for summary judgment to meet professional standards and without prejudice to the presentation of Plaintiff's claim within the time anticipated by the prior extension; plaintiff's counsel will be travelling the day after the motion is due; and plaintiff's counsel

¹ The previous stipulation approved by the court extended the deadline for plaintiff to file her motion for summary judgment to July 26, 2021 (see ECF No. 16). Accordingly, the court assumes this requested four-day extension is to July 30, 2021.

1 anticipates that completing the motion for summary judgment may require an additional 10 hours of
2 professional time due to the size of the record and number of issues involved.

3 This request for this modification of the scheduling order is made in good faith, without
4 dilatory motive and not for purposes of undue delay or to prejudice the interest of any party.
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6 SO STIPULATED AND AGREED, July 28, 2021:

7 For Plaintiff:

8 WEEMS LAW OFFICES
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13 */s/Robert C. Weems* _____ By: */s/ Sathya Oum* _____
14 ROBERT C. WEEMS,
15 Attorney for Plaintiff
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SO ORDERED.

DATE: July 28, 2021.

For Defendant:

PHILLIP A. TALBERT
Acting United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration
SATHYA OUM,
Special Assistant United States Attorney
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/s/ Sathya Oum _____
SATHYA OUM,
Special Assistant United States Attorney
and Attorney for the Defendant



EDMUND F. BRENNAN
U.S. MAGISTRATE JUDGE